

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

FILED
CLERK, U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2008 AUG 21 PM 3:42

UNITED STATES OF AMERICA : Criminal No. 08-121-SLR
:
vs. :
:
RASHEEM DOLLARD :

**DEFENDANT, RASHEEM DOLLARD'S
MOTION FOR EXTENSION OF TIME WITHIN
WHICH TO FILE PRE-TRIAL MOTIONS**

TO THE HONORABLE SUE L. ROBINSON, A JUDGE OF SAID COURT:

AND NOW, comes the Defendant, RASHEEM DOLLARD, by his Court-appointed counsel, CHRISTOPHER G. FURLONG, ESQUIRE, and respectfully requests that the time within which to file Pre-trial Motions be extended, and in support thereof, avers as follows:

1. Defendant, RASHEEM DOLLARD, was initially arrested by Wilmington Police Officers on or about July 11, 2008.
2. On or about August 14, 2008, Defendant was arraigned by this Court and having been previously detained after a hearing on Government's Motion for same.
4. Defendant's counsel was court-appointed to represent Defendant on July 24, 2008.
5. Counsel met with Defendant for the first time on August 1, 2008
6. Since Defendant's arrest, Defendant has been housed at the Salem County Correctional Facility in Woodstown, New Jersey. As a result of this placement, counsel does not have immediate access to his client.
7. Defense counsel is contemporaneously requesting of the Government to

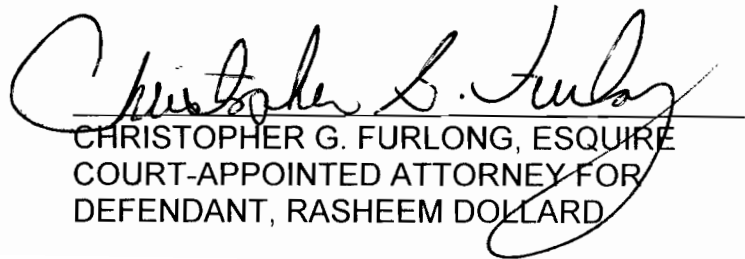
provide Defendant with discovery materials already relative to this case.

8. Counsel anticipates that materials will be forthcoming, but has yet to receive same.

9. Counsel for Defendant has not contacted John C. Snyder, Esquire, the Assistant United States Attorney to whom this case has been assigned. However, based on prior discussion, counsel believes that Mr. Snyder would have no opposition to Defendant's request for an extension of time within which to file pre-trial motions.

WHEREFORE, Defendant requests this Honorable Court to grant an extension of time within which to file pre-trial motions.

Respectfully submitted,




CHRISTOPHER G. FURLONG, ESQUIRE
COURT-APPOINTED ATTORNEY FOR
DEFENDANT, RASHEEM DOLLARD

VERIFICATION

I, **CHRISTOPHER G. FURLONG, Esquire**, attorney for Defendant, **RASHEEM DOLLARD**, hereby verify that I am authorized to take this verification for my client and that the statements set forth in the foregoing Motion are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S.A. Sec. 4904, relating to unsworn falsification to authorities.

DATED: August 19, 2008


CHRISTOPHER G. FURLONG, Esquire

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA	:	Criminal No. 08-121-SLR
	:	
vs.	:	
	:	
RASHEEM DOLLARD	:	

ORDER

AND NOW, this day of , 2008, upon motion of Defendant, RASHEEM DOLLARD, by and through his Court-appointed counsel, CHRISTOPHER G. FURLONG, ESQUIRE, it is hereby **ORDERED** and **DECREED** that the Motion for Extension of Time in which to file Pre-trial Motions is hereby granted.

Defendant hereby will have until September 30, 2008 to file said Motions or upon further application filed with the Court.

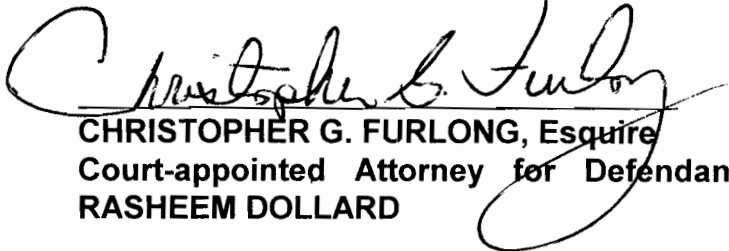
BY THE COURT:

SUE L. ROBINSON J.

CERTIFICATE OF SERVICE

I, **CHRISTOPHER G. FURLONG, ESQUIRE**, Court-appointed attorney for the Defendant, RASHEEM DOLLARD, hereby certify that I served a true and correct copy of the Motion for Extension of Time Within Which to File Pre-Trial Motions by United States Mail upon the following:

John C. Snyder, Esquire
Assistant United States Attorney
U.S. Department of Justice
U.S. Attorney's Office - District of Delaware
1007 Orange Street
PO Box 2046
Wilmington, DE 19399-2046


CHRISTOPHER G. FURLONG, Esquire
Court-appointed Attorney for Defendant,
RASHEEM DOLLARD

DATED: August 19, 2008